

Alexandria Bennett vs Walmart
PARKER, ELIZABETH on 06/22/2023

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ALABAMA
3 SOUTHERN DIVISION

4 _____

5 Alexandria Bennett

6 Plaintiff,

7 v.

Case No.

8 Walmart, Inc.,

2:22-cv-01306-AMM

9 Defendant.

10 _____

11 AUDIOVISUAL DEPOSITION OF ELIZABETH PARKER

12 DATE:

13 TIME:

14 LOCATION: Zoom, Remote

15 REPORTED BY: Freya Amis, Remote Online Notary Public

16 JOB No.: 12416

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4	EMS LAW, LLC	4	By Ms. Gordon 59
5	2100 First Avenue, North, Suite 300	5	
6	Birmingham, Alabama, 35203	6	E X H I B I T S
7	ellise@emwlawllc.com	7	NO. DESCRIPTION PAGE
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22		22	
23		23	
24		24	
25		25	
1	P R O C E E D I N G	1	the record, the witness positively identified herself
2	THE REPORTER: We are on the record.	2	as Elizabeth Parker by driver's license issued in
3	Today's date is June 22, 2023, and the time is now	3	Alabama State, and the witness is presently located in
4	10:04 a.m., Central Standard Time.	4	Birmingham, Alabama.
5	Good morning. My name is Freya Amis. I'm	5	WHEREUPON,
6	the officer designated by DepoDirect to take the	6	ELIZABETH PARKER,
7	record of this proceeding. I request all parties	7	called as a witness, and having been first duly sworn
8	stipulate and agree that by video conference	8	to tell the truth, the whole truth and nothing but the
9	technology, this will be the remote deposition of	9	truth, was examined and testified as follows:
10	Elizabeth Parker in the matter of Alexandria Bennett	10	THE REPORTER: Thank you. The witness is
11	versus Walmart, Inc., Case No. 2:22-cv-01306-AMM.	11	sworn in, and this proceeding may begin.
12	Counsel, will you please state your	12	MS. WASHINGTON: Okay. Great.
13	appearance for the record, your firm, who you	13	EXAMINATION
14	represent, and that you agree to stipulate that I may	14	BY MS. WASHINGTON:
15	place this witness under oath and report this	15	Q Again, I am Ellise Washington. I represent
16	proceeding remotely.	16	Ms. Bennett, the plaintiff in this action. And before
17	MS. WASHINGTON: I'm attorney Ellise	17	we get started, I wanted to go through a few ground
18	Washington. I represent the plaintiff in this action,	18	rules, depositions with you, just so that we're on the
19	Ms. Alexandria Bennett, and I do consent to placing	19	same page; is that okay, Ms. Parker?
20	the witness under oath and the usual stipulations to	20	A Yes.
21	be put in place.	21	Q So the court reporter is going to take down
22	MS. GORDON: Gwen Gordon for Walmart Stores	22	everything we say. And it's important that you answer
23	East LP, and I also consent to putting the witness	23	with words, rather than with a nod or shake of the
24	under oath and usual stipulations.	24	head, do you understand?
25	THE REPORTER: Thank you. Before going on	25	A Yes.

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<p>1 Q So I just want to prequalify that if I ask 2 you to make a verbal statement, it's not me being 3 rude, it's just to conserve the record.</p> <p>4 A Okay.</p> <p>5 Q Okay. Also, it's going to be very important 6 that you and I do not speak over one another. So it's 7 important that you wait for me to finish asking the 8 question before answering, do you understand?</p> <p>9 A I do.</p> <p>10 Q And if you don't understand any of my 11 questions, please let me know, and I'll rephrase it; 12 is that okay?</p> <p>13 A Yes.</p> <p>14 Q And if you need to take a break, let me 15 know, and we can take a break, you understand?</p> <p>16 A I do.</p> <p>17 Q All right. So are you prepared to answer my 18 questions today?</p> <p>19 A Yes, ma'am.</p> <p>20 Q Is there any reason that you won't be able 21 to give me full, complete, and truthful answers to my 22 questions today?</p> <p>23 A No, ma'am.</p> <p>24 Q All right. And you understand that you are 25 under oath and sworn to tell the truth and that your</p>	<p>1 testimony provided here today has the same force and 2 effect as if we were in front of a judge or jury, do 3 you understand that?</p> <p>4 A Yes.</p> <p>5 Q All right. So just to get started, I want 6 to ask you a few preliminary questions, such as where 7 do you currently live?</p> <p>8 A I live in Bedford, Alabama.</p> <p>9 Q And how close do you live to the Helena 10 Walmart location where the incident in this case 11 happened?</p> <p>12 A Approximately 35 minutes.</p> <p>13 Q Okay. And have you ever given a deposition 14 before?</p> <p>15 A I have not.</p> <p>16 Q Okay. And did you review any documents to 17 prepare for this deposition today?</p> <p>18 A Yes, ma'am.</p> <p>19 Q Can you tell me, generally, what documents 20 you reviewed to prepare?</p> <p>21 A I reviewed the information that we provided, 22 the incident report, the photographs, the video, and 23 the policies that we have.</p> <p>24 Q Okay. And what policies do you -- what 25 policies did you review that you, and I'm assuming</p>
<p>1 you're meaning Walmart, have? What policies exactly 2 did you review?</p> <p>3 A I reviewed our safety policy, our accident 4 reporting policy.</p> <p>5 Q Okay. Are those the only two policies you 6 reviewed in preparation for today?</p> <p>7 A That I remember, yes.</p> <p>8 Q Oh, just that you recall at this time.</p> <p>9 Okay. That's not a problem. And so were you at the 10 Helena Walmart location when this accident occurred?</p> <p>11 A I work there. I wasn't physically at the 12 store when it happened.</p> <p>13 Q Okay. What was your title at the time of 14 this incident on October 5th -- I'm so sorry, October 15 15th, 2020, what was your title at Walmart at the 16 time?</p> <p>17 A I was the store manager.</p> <p>18 Q Okay. And who all did you speak to who was 19 present at the location about this accident?</p> <p>20 A I spoke to Roman Cooper who was the manager 21 on duty at the time who took the report.</p> <p>22 Q Okay. Did you speak to any other employees 23 of Walmart about the incident who were there that day?</p> <p>24 A Not that I remember.</p> <p>25 Q Okay. So before we go into too much more</p>	<p>1 detail about the incident and what happened that day, 2 I wanted to get some more information about Walmart's 3 policies and your role there.</p> <p>4 So how long have you been employed with 5 Walmart?</p> <p>6 A Twenty-three years.</p> <p>7 Q Okay. And have you always been at the 8 Helena location?</p> <p>9 A No, ma'am. I've been there since 2017.</p> <p>10 Q Okay. And what other Walmart locations have 11 you worked at?</p> <p>12 A I've worked at Sylacauga, Trussville, 13 Talladega, Gardendale, Leeds, and Vestavia.</p> <p>14 Q Oh, so over the course of over 20 years, 15 what all roles did you play at Walmart, what all 16 positions did you hold?</p> <p>17 A I've worked in the shoe department; I've 18 been a cashier; I've been a manager on the front end; 19 I've been assistant manager; I worked DSD, which is 20 the back door; I was a co-manager and a store manager.</p> <p>21 Q Okay. And so the progression of your 22 employment positions, I guess, the most recent is the 23 highest position you've held at Walmart?</p> <p>24 A The store manager?</p> <p>25 Q Yes.</p>

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<p>1 A Yes, ma'am.</p> <p>2 Q Okay. And how long have you been a store</p> <p>3 manager, not just at Helena, but just at any store?</p> <p>4 How long have you been a store manager at a Walmart?</p> <p>5 A Eight years.</p> <p>6 Q Okay. And what all stores have you been a</p> <p>7 store manager at?</p> <p>8 A Helena and Vestavia Hills.</p> <p>9 Q Okay. And I understand that the Helena</p> <p>10 location is a neighborhood market Walmart location?</p> <p>11 A Yes, ma'am.</p> <p>12 Q And is the Vestavia Hills location also a</p> <p>13 neighborhood market location?</p> <p>14 A Yes, ma'am.</p> <p>15 Q And so can you tell me about your duties as</p> <p>16 a store manager, what are your roles?</p> <p>17 A Basically, overseeing the entire store and</p> <p>18 ensuring that, you know, we do the day-to-day duties</p> <p>19 of the store. Whether that's stocking the shelves,</p> <p>20 ringing people up at the front. Whatever, you know,</p> <p>21 is necessary in the day-to-day operations. I'm in</p> <p>22 charge of all of it.</p> <p>23 Q And what kind of training were you required</p> <p>24 if any to go through to be a store manager?</p> <p>25 A I don't know that I had a -- I had on-the-</p>	<p>1 job training, you know, shadowing other people. And I</p> <p>2 had a mentor that came in and worked with me some. I</p> <p>3 didn't go to any official store manager training</p> <p>4 besides being a co-manager, which was kind of a step</p> <p>5 between an assistant and a store manager, where you</p> <p>6 learn how do to run the store.</p> <p>7 Q Okay. Are there any employment handbooks or</p> <p>8 manuals that you have for being a store manager?</p> <p>9 A There are -- we have e-learners that are</p> <p>10 specific to store managers, which are computer-based</p> <p>11 learning that I completed. And there -- back when I</p> <p>12 got promoted, I think I did a training plan on the</p> <p>13 computer as well.</p> <p>14 Q Okay. And these computer trainings, do you</p> <p>15 get any type of written material before or after these</p> <p>16 trainings to retain for your own records?</p> <p>17 A Not that I recall. I'm sure there's</p> <p>18 something that I could print out, but I don't know</p> <p>19 that I have anything.</p> <p>20 Q Okay. And I want to talk about just your</p> <p>21 employment generally with Walmart. Do you all have a</p> <p>22 Walmart employee handbook or manual or policies-and-</p> <p>23 procedures book that is in writing that's given to</p> <p>24 employees?</p> <p>25 A We do have a new hire orientation guide that</p>
<p>1 they get on their first day of employment.</p> <p>2 Q Okay. And what information is contained in</p> <p>3 that document?</p> <p>4 A As far as I recall, I mean, it had their</p> <p>5 information that they're going to need to, like, log</p> <p>6 into the computers and stuff. It has information on</p> <p>7 benefit. It has a few policies in it.</p> <p>8 Q And what kind of policies are in it?</p> <p>9 A Off the top of my head, I know it has</p> <p>10 alcohol and drug free workplace policies. And</p> <p>11 there's, like, an equal opportunity employment policy,</p> <p>12 but that's probably all I remember.</p> <p>13 Q Okay. And so you don't recall there being</p> <p>14 any policies on daily tasks or worksheets that must be</p> <p>15 completed during shifts or anything like that?</p> <p>16 A Not that they get in orientation, no.</p> <p>17 Q Okay. And they'd get an orientation, can</p> <p>18 you walk me through the orientation process?</p> <p>19 A I can walk you through it right now if</p> <p>20 that's okay?</p> <p>21 Q Okay.</p> <p>22 A Like, current. Okay. So, basically, their</p> <p>23 very first day of Walmart they're going to come to</p> <p>24 work, and they're going to prove that they are allowed</p> <p>25 to work in the United States by completing an I-9.</p>	<p>1 And then they have a couple of hours where they go</p> <p>2 through this handbook with the people lead, and they</p> <p>3 talk about policies.</p> <p>4 Then they do a safety tour with a member of</p> <p>5 management, which is going to be a tour of the</p> <p>6 building, point out emergency exits, talk about what</p> <p>7 to do for different things that could happen. And</p> <p>8 then they're going to spend a couple of hours with a</p> <p>9 team lead, like, kind of shadowing them.</p> <p>10 Q Okay. And are there any, I guess,</p> <p>11 checklists that the orientation leaders use to check</p> <p>12 off evidence and that someone completed these</p> <p>13 trainings?</p> <p>14 A The only thing that we would have that we</p> <p>15 retain right now is the safety checklist. When they</p> <p>16 walk around, they check once they learn certain</p> <p>17 things, and then they sign it.</p> <p>18 Q Okay. And do you all maintain those records</p> <p>19 for set amounts of time? Are they placed in -- or are</p> <p>20 they placed in employees' personnel records?</p> <p>21 A They are. They're downloaded into a digital</p> <p>22 toolbox for that associate.</p> <p>23 Q So you all have access to the sheets that</p> <p>24 evidence their completion of that safety worklist?</p> <p>25 A For current associates, yes.</p>

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<p>1 Q For current. But so if someone is, I guess, 2 terminated or they resigned from their position, then 3 their personnel file is also destroyed? 4 A I'm sure it's somewhere in corporate, but I 5 don't have access to it. 6 Q Okay. So you have access to current 7 employees' personnel files? 8 A Yes, ma'am. 9 Q All right. And can you tell me about that 10 safety checklist, what all is included on that 11 checklist? 12 A So we point out spill stations, which are 13 throughout the store and are to be stocked with 14 certain supplies: pocket pads, the spill cleanup 15 stuff, a broom, a dustpan, a safety phone. And, you 16 know, we talk about what to do when we see a spill. 17 You don't leave it. You -- if you can clean it up 18 right then, you clean it up. If not, you stand with 19 it until you can get someone to help you clean it up. 20 We point out all the fire exits in the 21 building and talk about what to do in the event of a 22 fire or another emergency when we have to evacuate. 23 We go to the hazmat station, which is -- we have 24 different color buckets that we have to dispose of 25 different items in, so we about how to dispose of</p>	<p>1 different things. 2 We go to the compactor and the baler to talk 3 about how to use those. And we talk about top stock 4 safety, which is the shelf on the tops of the 5 counters. And about how we don't stack things too 6 high on there, and we don't put heavy things on there 7 because all of this can be dangerous to customers or 8 associates. 9 THE REPORTER: May I just interrupt, I'm 10 sorry. What microphone are you using? It's just a 11 little muddled where I'm just not getting a few -- 12 there's a couple words I'm not hearing well. Are you 13 close to it? Or -- 14 MS. GORDON: She's about 12 inches from it, 15 yeah. It's sitting on the table. It's one that sits 16 on the table. I'm not sure if I can get it any 17 closer. 18 THE REPORTER: Okay. You can't use the one 19 from Zoom, like a computer one? 20 MS. GORDON: We have it up on a screen. 21 THE REPORTER: Okay. 22 MS. GORDON: We're all connected, the 23 speaker, and everything else. 24 THE WITNESS: I can try to talk more into it 25 if that helps?</p>
<p>1 MS. WASHINGTON: I was having a few issues 2 with hearing as well. Like, some words they sound a 3 little muddled. 4 MS. GORDON: Yeah. This is the tricky part 5 about Zoom. You can't ever count on it. I don't know 6 how to get it any closer. I mean -- 7 THE REPORTER: Okay. 8 MS. GORDON: I don't know. 9 THE REPORTER: We'll keep going forward. 10 MS. GORDON: It's up here in front of her. 11 And so I don't know how to -- 12 MS. WASHINGTON: If I have a question where 13 I didn't understand the answer. I think I'm 14 understanding just enough to, you know, go from here. 15 I think we'll be fine, but I may ask you to repeat if 16 it gets too much of an issue; is that okay? 17 MS. GORDON: Sure. That's fine. 18 MS. WASHINGTON: And I do want to make one 19 stipulation on the record. I am the full-time 20 caregiver for my father, and he is currently having a 21 procedure done. So I am on-call. So if I get a phone 22 call, I am definitely -- that's the only reason I 23 would answer. 24 MS. GORDON: That's fine. 25 MS. WASHINGTON: Okay. All right. So going</p>	<p>1 back -- thank you so much for going over those safety 2 checklist that you all maintain. 3 BY MS. WASHINGTON: 4 Q Moving forward, as far as reporting spills. 5 I do want to ask specifically about that. Is there a 6 particular chain of command that spills are reported? 7 Can you go over just in detail how those are reported 8 and handled and resolved? 9 A Basically, any associate who sees a spill is 10 pretty much trained to clean it up if they can. You 11 know, if it's a small spill, you know, they should 12 have a pocket pad, which is a little orange, 3 by 5, I 13 guess, absorbent pad. It cleans up an awful lot of 14 moisture. And so if they have that and they can clean 15 it easily, they're to do that. 16 If it's larger and they can't clean it up 17 themselves, they can call someone else to help them, 18 to assist them. And, you know, we can use paper 19 towels, if it's, you know -- if that's good enough. 20 Or we can use the All-Absorb that I talked earlier. 21 It's basically this kind of clumping stuff that you 22 just sprinkle over your spill, and then you can just 23 sweep it up. 24 Q Okay. And do you all have any written logs 25 for spills, where spills were reported to someone?</p>

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<p>1 A No, ma'am.</p> <p>2 Q Okay. Do you all have a, I guess, store</p> <p>3 policy on maintenance or cleaning or repairs, do you</p> <p>4 all keep any written policies on that?</p> <p>5 MS. GORDON: Object to the form.</p> <p>6 MS. WASHINGTON: She objected to form, but</p> <p>7 you can still answer, or did you understand or need me</p> <p>8 to rephrase?</p> <p>9 THE WITNESS: Can you rephrase it?</p> <p>10 MS. WASHINGTON: Sure.</p> <p>11 BY MS. WASHINGTON:</p> <p>12 Q So do you all maintain written logs of</p> <p>13 maintenance, repairs, or requests for maintenance or</p> <p>14 repairs?</p> <p>15 MS. GORDON: Object to the form. Are you</p> <p>16 talking about just with regard to floors, or I just --</p> <p>17 can you narrow it a little bit, or are you talking</p> <p>18 about the whole store maintenance?</p> <p>19 MS. WASHINGTON: I'm starting generally, and</p> <p>20 I am going to kind of niche in --</p> <p>21 MS. GORDON: Okay.</p> <p>22 MS. WASHINGTON: -- as we go forward, but I</p> <p>23 wanted a general response.</p> <p>24 MS. GORDON: Sure.</p> <p>25 THE WITNESS: We have a portal, I guess,</p>	<p>1 that we use to request maintenance, and I have a</p> <p>2 technician that comes in and fixes things that are</p> <p>3 broken.</p> <p>4 MS. WASHINGTON: Okay.</p> <p>5 BY MS. WASHINGTON:</p> <p>6 Q And who is responsible for cleaning the</p> <p>7 Helena store?</p> <p>8 A We have maintenance associates that do basic</p> <p>9 maintenance tasks. And then, you know, things like</p> <p>10 dusting or cleaning shelves, pretty much everybody's</p> <p>11 responsible for doing certain parts. Say if you</p> <p>12 change an end cap, you're responsible for cleaning the</p> <p>13 end cap.</p> <p>14 Q Are those individuals who are responsible</p> <p>15 for the cleaning tasked with doing so at set</p> <p>16 intervals?</p> <p>17 A No, not necessarily.</p> <p>18 Q So how are they tasked with -- how often or</p> <p>19 in what manner are they tasked with doing those</p> <p>20 duties?</p> <p>21 A Mostly as needed. I mean, the floors get</p> <p>22 swept and scrubbed -- now it's every night; it used to</p> <p>23 be every morning. But we didn't have overnight back</p> <p>24 in 2020, we do now.</p> <p>25 I mean, the registers are cleaned once a day</p>
<p>1 and as needed. Carts are gotten off the lot as</p> <p>2 needed. So it's not really something based on a set</p> <p>3 time just everything is done as it's needed.</p> <p>4 Q Okay. And as far as the standard of</p> <p>5 cleanliness for the store, are there certain, I guess,</p> <p>6 check marks of cleanliness that must be made? Such as</p> <p>7 dust levels or, I guess, the floors, are they to be</p> <p>8 buffed or moped? What are you all's cleaning</p> <p>9 standards when it comes to just the upkeep of the</p> <p>10 store?</p> <p>11 MS. GORDON: Object to the form.</p> <p>12 THE WITNESS: Can you rephrase the question?</p> <p>13 MS. WASHINGTON: Sure.</p> <p>14 BY MS. WASHINGTON:</p> <p>15 Q Like, what would you say is the level of</p> <p>16 cleanliness that you all require? Or if any, do you</p> <p>17 all require that the floors are kept to, like I said,</p> <p>18 they are there to be buffed, or are they to be mopped</p> <p>19 on a consistent basis? Is there, like, a no</p> <p>20 stickiness policy for, you know, regular wear and</p> <p>21 tear? I just wanted a general response as to what are</p> <p>22 you all's cleanliness policy, if any?</p> <p>23 MS. GORDON: Object to the form. Answer if</p> <p>24 you have an answer.</p> <p>25 THE WITNESS: There's not really a</p>	<p>1 cleanliness policy. The store is, you know, cleaned</p> <p>2 every morning before we open. And then as needed,</p> <p>3 throughout the day, if somebody notices something, we</p> <p>4 stop and fix it.</p> <p>5 MS. WASHINGTON: Okay.</p> <p>6 BY MS. WASHINGTON:</p> <p>7 Q As far as spills as well, I know that you</p> <p>8 stated that spills are to be cleaned, if possible,</p> <p>9 immediately by whatever employee sees it first; is</p> <p>10 that correct?</p> <p>11 A Yes. But not if possible, like, they're</p> <p>12 responsible. If you see it, you're responsible for</p> <p>13 it. So you're not going to leave it. If you can't</p> <p>14 clean it up, you're going to call somebody to help</p> <p>15 you.</p> <p>16 Q And how do you call someone to help you?</p> <p>17 A Either with a walkie-talkie or -- some</p> <p>18 associates don't have a walkie-talkie. They all have</p> <p>19 cell phones; they can reach out. We have a Me@Walmart</p> <p>20 system that associates can use to communicate with</p> <p>21 each other in an app. Or often people just walk by</p> <p>22 us.</p> <p>23 Q Okay. And are there any, I guess,</p> <p>24 procedures that will require the placement of warning</p> <p>25 signs or I guess warning devices to warn customers</p>

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<p>1 about potential hazards?</p> <p>2 A We do have wet floor signs. You know, say</p> <p>3 we just mopped or something, and the floor may be a</p> <p>4 little slippery, we would put a wet floor sign out.</p> <p>5 But, usually, we can dry the floor, and we don't need</p> <p>6 that.</p> <p>7 Q Okay. You can dry -- I'm sorry, I couldn't</p> <p>8 hear that. You said that you could dry the floor?</p> <p>9 A You can dry it. You can just use a wet mop</p> <p>10 and then a dry mop, and it's usually dry.</p> <p>11 Q Thank you. And so as far as spills that are</p> <p>12 large and, I guess, require significant cleanup</p> <p>13 endeavors, how do you all handle those particular</p> <p>14 areas?</p> <p>15 A We have a scrubber, a big machine that will</p> <p>16 kind of go through and suck up water, so or, you know,</p> <p>17 kind of liquid. So if we had something big, we could</p> <p>18 use that.</p> <p>19 Q Now I want to switch to, I guess, slip-and-</p> <p>20 fall incidents at this particular Helena store. Are</p> <p>21 you aware of the number of slip-and-falls that have</p> <p>22 happened at this particular location since you've been</p> <p>23 employed there?</p> <p>24 MS. GORDON: Object to the form.</p> <p>25 THE WITNESS: I'm not aware of the total</p>	<p>1 number. No, ma'am.</p> <p>2 BY MS. WASHINGTON:</p> <p>3 Q But are you aware of some slip-and-falls</p> <p>4 that have occurred since you've been employed at the</p> <p>5 Helena Walmart location?</p> <p>6 A I am.</p> <p>7 Q Okay. About how many do you recall?</p> <p>8 A Probably three.</p> <p>9 Q Okay. And can you give me -- I guess, let's</p> <p>10 talk about them generally, can you tell me how those</p> <p>11 happened.</p> <p>12 A I don't remember specifics. I remember two</p> <p>13 in 2020. There was one in October, I think, where</p> <p>14 somebody just fell.</p> <p>15 Q Okay. I know that Ms. Bennett's fall</p> <p>16 happened in October 2020, do you remember if there was</p> <p>17 another incident of a fall in October of 2020?</p> <p>18 A Not that I recall.</p> <p>19 Q Okay. So the one you recall from October of</p> <p>20 2020 is the one of Ms. Bennett?</p> <p>21 A Yes, ma'am.</p> <p>22 Q All right. Have you ever been at the store</p> <p>23 when a slip-and-fall occurred?</p> <p>24 A I'm sure I have.</p> <p>25 Q Okay. And when slip-and-falls occur at the</p>
<p>1 store, are they resolved? How long does it take for</p> <p>2 them to be, I guess, resolved?</p> <p>3 A What do you mean by resolved?</p> <p>4 Q How long does it take to, I guess, address</p> <p>5 the slip-and-fall and to ensure that, you know, any</p> <p>6 injuries have been addressed, an incident report made</p> <p>7 and, I guess, the cause cleaned up or cleared so that,</p> <p>8 you know, no further injuries occur?</p> <p>9 MS. GORDON: Object to the form.</p> <p>10 THE WITNESS: I mean, when we -- when we</p> <p>11 hear about it, we get a tablet and take an incident</p> <p>12 report. Our first concern would be for the customer</p> <p>13 to make sure that, you know, they're okay. Once we've</p> <p>14 done that, we would clean up the spill.</p> <p>15 MS. WASHINGTON: Okay.</p> <p>16 BY MS. WASHINGTON:</p> <p>17 Q And I understand that as a part of you all's</p> <p>18 procedures on addressing slip-and-falls, employees are</p> <p>19 to take an incident report, correct?</p> <p>20 A Yes, ma'am.</p> <p>21 Q Okay. And that incident report is taken</p> <p>22 electronically?</p> <p>23 A Yes, ma'am.</p> <p>24 Q Okay. And how long are those reports kept</p> <p>25 in you all's records?</p>	<p>1 A I don't know. We send it to our claims</p> <p>2 agency. And it's -- I mean, there's an incident</p> <p>3 number, and I'm sure they can look it up for however</p> <p>4 long, but I don't know how long it would be.</p> <p>5 Q Okay. And the claims agency, is it an</p> <p>6 internal Walmart claims agency or some external agency</p> <p>7 that you're submitting this to?</p> <p>8 A It's Walmart. It's Walmart's clients.</p> <p>9 Q Okay. All right. And so all reports are</p> <p>10 just submitted to that claims agency, which is with</p> <p>11 Walmart Corporate; is that correct?</p> <p>12 A Yes.</p> <p>13 Q Okay. So do you all have access to those</p> <p>14 reports internally, like, can you personally, as store</p> <p>15 manager, look up those reports?</p> <p>16 A I personally cannot, no.</p> <p>17 Q Is there anyone else in your store who does</p> <p>18 have access to those records?</p> <p>19 A No.</p> <p>20 MS. WASHINGTON: Okay. So sorry. My</p> <p>21 computer just froze. I'm trying to pull up some</p> <p>22 records. Give me one second.</p> <p>23 MS. GORDON: You're fine. Can we go off the</p> <p>24 record one second? Let me see if I can figure out how</p> <p>25 to make you bigger so that when you share the -- right</p>

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<p>1 now, you're just one of the tiles, and I was going to 2 try to expand you so that we can see the records you 3 put up. 4 MS. WASHINGTON: Okay. 5 THE REPORTER: Yes. So I have the witness 6 spotlighted for our firm has that. And then when she 7 shows a -- shares her screen, it'll take up the whole 8 screen. 9 MS. GORDON: Perfect. Thank you so much. 10 MS. WASHINGTON: Okay. All right. Here we 11 go. I am going to share my screen to present what is 12 being admitted as Plaintiff's Exhibit 1. It is the 13 accident report that you all submitted to us in your 14 initial disclosures. 15 (Plaintiff's Exhibit 1 marked for 16 identification.) 17 BY MS. WASHINGTON: 18 Q So does this form look familiar? 19 A Yes, ma'am. 20 Q Okay. And so on this is when -- it states 21 here that, "Describe in your own words the events 22 leading up to this incident." This particular 23 statement is written by the actual, I guess, person 24 who was involved in the accident, or is this written 25 by a Walmart employee as told to them by the</p>	<p>1 individual? 2 A It could be either one. Either the customer 3 will take the tablet and type in what they say, or 4 sometimes they dictate it to the manager on duty and 5 they type it. 6 Q Okay. And in Ms. Bennett's incident report 7 form here, do you know which of those happened? Do 8 you know if she typed this in or if one of your 9 employees typed it in? 10 A No, ma'am, I don't know. 11 Q It has two names listed here as the 12 associates who the incident was reported to or who 13 were in the area, are you familiar with Glenda 14 Washnurn or Roman Cooper? 15 A Yes, ma'am. 16 Q Okay. And is Glenda's name here correct, 17 Washnurn, or is it Washburn? 18 A It's Washburn with a B. 19 Q Okay. Okay. Just want to verify that's the 20 same person that we had seen in other documents. Did 21 you speak with either -- first, do both of them still 22 work at the Helena store? 23 A No, ma'am. Neither of them are employed 24 anymore. 25 Q Either of them are employed. Are you still</p>
<p>1 in contact with either of them? 2 A No, ma'am. 3 Q Could you get in contact with either of 4 them? 5 A Yes, ma'am. If I needed to, I could. 6 Q Okay. Do you recall speaking with either of 7 them or both of them after this incident? 8 A No, ma'am, I don't. 9 Q Okay. I'm going to stop sharing my screen 10 here. So I guess I want to ask, after the report is 11 made, you know, after an incident occurs, is there any 12 meeting between associates who were involved in the 13 reporting of the incident and store management? 14 A Well, the highest earnings manager on duty 15 would take the report, so sometimes there's not. But 16 in this case, there would have been because we would 17 have had to pull video; neither of them would have had 18 access to the video. 19 So somebody would have talked to them about 20 what happened and found out more details so that we 21 could pull the video and, you know, get all -- 22 everything sent out to the claims people that we 23 talked about earlier. 24 Q Okay. And do you know who that particular 25 person was in this case, that spoke with Glenda or</p>	<p>1 Roman? 2 A I know that Nathan French burned the video. 3 Q Nathan French did what to the video, I'm 4 sorry? 5 A He made the video, DVD disc. 6 Q Okay. And I am going to be doing some flip 7 flopping with the questions here. I know that we're 8 talking about Walmart procedures, this particular 9 incident, what happened at the store. So please bear 10 with me as I do this. 11 So when it comes to video surveillance at 12 the Helena location, are there video surveillance 13 cameras that can see down every aisle at the store? 14 A No. 15 Q Okay. Are you aware of all of the aisles 16 that are not, I guess, viewable in video surveillance? 17 A Not off the top of my head, no. 18 Q So do you all keep a, I guess -- I guess, do 19 you all keep any internal communications that list 20 those particular aisles that are not within video 21 surveillance view? 22 A Not that I know of. 23 Q Okay. And do you know why there aren't 24 video surveillance? 25 A No, ma'am.</p>

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<p>1 Q Have you ever, as store manager, requested</p> <p>2 that there be video surveillance on every aisle?</p> <p>3 A I have asked my market asset protection</p> <p>4 manager if we could possibly get more video.</p> <p>5 Q And when did you ask that asset protection</p> <p>6 person that?</p> <p>7 A I don't know.</p> <p>8 Q Oh, I mean, what was their response?</p> <p>9 A That we couldn't add any more.</p> <p>10 Q Okay. Did he give you a reason as to why</p> <p>11 they could not add any more?</p> <p>12 A Not that I remember.</p> <p>13 Q Okay. And so in Ms. Bennett's case on</p> <p>14 October 15, 2020, did she fall in the, I guess, water</p> <p>15 aisle?</p> <p>16 A That is --</p> <p>17 MS. GORDON: Object to the form. You can</p> <p>18 answer, if you know.</p> <p>19 THE WITNESS: That is what the report says,</p> <p>20 yes, ma'am.</p> <p>21 BY MS. WASHINGTON:</p> <p>22 Q Okay. Do you know what aisle -- like, what</p> <p>23 the aisle is called? Because I call it the water</p> <p>24 aisle because there were pallets of water bottles</p> <p>25 there and jugs and such, but do you all have an</p>	<p>1 internal name for particular aisle?</p> <p>2 A I call it the water aisle.</p> <p>3 Q Okay. And so in relation to video</p> <p>4 surveillance cameras, where is the nearest camera to</p> <p>5 that aisle?</p> <p>6 A I believe the nearest one would be on the</p> <p>7 beer aisle, which is the next aisle.</p> <p>8 Q Okay. So if I am facing the back of the</p> <p>9 store. So when I walk into the Helena store, and I'm</p> <p>10 facing the back towards where the refrigerators are in</p> <p>11 the very back --</p> <p>12 A Uh-huh.</p> <p>13 Q -- would that aisle be to the left or right</p> <p>14 of the water aisle?</p> <p>15 A To the left.</p> <p>16 Q Okay. And would that camera be facing the</p> <p>17 front of the store or the back of the store?</p> <p>18 A The back, I believe.</p> <p>19 Q Okay. And how much of the water aisle, if</p> <p>20 any, does that nearest camera capture?</p> <p>21 A Not much to the best of my memory.</p> <p>22 Q And so, would it be safe to say that there</p> <p>23 is no video surveillance footage of Ms. Bennett's fall</p> <p>24 from Walmart's surveillance camera?</p> <p>25 A Not that we found, no, ma'am.</p>
<p>1 Q Did you all receive any photos or videos</p> <p>2 from others in the store that day?</p> <p>3 A Not that I'm aware of.</p> <p>4 MS. WASHINGTON: Okay. I am going to share</p> <p>5 my screen again, you all. And this is going to show</p> <p>6 what has been marked as Plaintiff's Exhibit No. 2.</p> <p>7 And it is photos that were sent to the plaintiff in</p> <p>8 the defendant's initial disclosures.</p> <p>9 (Plaintiff's Exhibit 2 marked for</p> <p>10 identification.)</p> <p>11 BY MS. WASHINGTON:</p> <p>12 Q Do any of these photos look familiar to you?</p> <p>13 A I think those are the pictures that we</p> <p>14 submitted with the accident report.</p> <p>15 Q Okay. Do you know who took these pictures?</p> <p>16 A Not a hundred percent, but I would think it</p> <p>17 was Roman.</p> <p>18 Q Okay. And why do you think it was Roman?</p> <p>19 A Because Roman took the report.</p> <p>20 Q Glenda also was listed on that report, could</p> <p>21 these potentially have been taken by Glenda as well?</p> <p>22 A They could have.</p> <p>23 Q Okay. And so I want to kind of go through</p> <p>24 each photo. There are five of them that were</p> <p>25 submitted. This first one, do you believe this</p>	<p>1 depicts the area where or nearby where Ms. Bennett</p> <p>2 fell that day? Is this photo from that actual day?</p> <p>3 MS. GORDON: Object to the form. Answer if</p> <p>4 you know.</p> <p>5 THE WITNESS: I don't know when the photo is</p> <p>6 from, but that is the water aisle.</p> <p>7 MS. WASHINGTON: Okay.</p> <p>8 BY MS. WASHINGTON:</p> <p>9 Q And do you know if these -- I guess I'm</p> <p>10 going to go through all five of them, that first one,</p> <p>11 but we confirmed that they're all from the water</p> <p>12 aisle. But do you believe these were taken on the day</p> <p>13 of the incident?</p> <p>14 MS. GORDON: Object to the form.</p> <p>15 THE WITNESS: If they were in the incident</p> <p>16 report, then they would have been taken the day of the</p> <p>17 incident.</p> <p>18 MS. WASHINGTON: Okay.</p> <p>19 BY MS. WASHINGTON:</p> <p>20 Q So they are potentially taken on the day of</p> <p>21 the incident. And can you tell me, in this second</p> <p>22 photo that's on your screen -- and I don't know if</p> <p>23 you see my cursor circling this area by what appears</p> <p>24 to be wetness in the area. Can you see that, the area</p> <p>25 where I'm circling with my cursor?</p>

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<p>1 A I can.</p> <p>2 Q Okay. Was it noted anywhere in you all's</p> <p>3 files or told to anyone verbally what this wet</p> <p>4 substance was on the floor?</p> <p>5 A Do you mean before the accident happened or</p> <p>6 after?</p> <p>7 Q Yes. From on the photos, I don't know about</p> <p>8 when, where, how, I'm just asking. The substance that</p> <p>9 we see on this photo, do you know if it was clearly</p> <p>10 identified as a particular type of liquid?</p> <p>11 MS. GORDON: Object to the form.</p> <p>12 THE WITNESS: Not that I know of off the top</p> <p>13 of my head.</p> <p>14 MS. WASHINGTON: Okay.</p> <p>15 BY MS. WASHINGTON:</p> <p>16 Q Was this substance referred to as water by</p> <p>17 anyone at Walmart?</p> <p>18 A It could have been.</p> <p>19 Q Okay. And in this area, where the photos is</p> <p>20 taken, do you know what this is, what this particular</p> <p>21 substance on the floor is?</p> <p>22 A It looks like dirt. It was the end of the</p> <p>23 day -- well, it was toward the end of the day. It's a</p> <p>24 high-traffic aisle, so it looks like the floor was</p> <p>25 dirty and needed to be scrubbed.</p>	<p>1 Q Okay. And so is this, I guess, dirt that</p> <p>2 you've stated, is any of this permanent, or is any of</p> <p>3 this permanent on the floor?</p> <p>4 MS. GORDON: Object to the form.</p> <p>5 THE WITNESS: That shouldn't be permanent.</p> <p>6 Sometimes that comes off with scrubbing or mopping</p> <p>7 even, but not usually. It usually takes the scrubber.</p> <p>8 Sometimes, the floor has to be waxed to get marks out</p> <p>9 of the floor.</p> <p>10 MS. WASHINGTON: Okay. And do you know --</p> <p>11 I'll come back to that. I'm going to finish sharing</p> <p>12 my screen on this, but we will return to the status of</p> <p>13 the floor at some point. I'm sorry, you guys, had to</p> <p>14 get back to my screen. I don't know why when I switch</p> <p>15 applications on my computer today, it freezes, like,</p> <p>16 from application to application. So sorry. Okay.</p> <p>17 BY MS. WASHINGTON:</p> <p>18 Q So going back to the -- I guess, the day of</p> <p>19 the incident, you were not there, but you did review</p> <p>20 the reports and statements that were made that day,</p> <p>21 correct?</p> <p>22 A Yes, ma'am.</p> <p>23 MS. WASHINGTON: Okay. I am going to share</p> <p>24 my screen, and I'm going to have quite a few</p> <p>25 statements here that were taken by you all. They're</p>
<p>1 going to be exhibits: 3, is going to be a statement</p> <p>2 from Roman Cooper, Walmart associate; there's going to</p> <p>3 be Plaintiff's Exhibit 4, which is a witness statement</p> <p>4 from customer Kellie Daughtry; there's going to be</p> <p>5 Exhibit 5, which is a statement by Walmart Associate</p> <p>6 Glenda Washburn; and there is going to be -- no,</p> <p>7 Exhibit 3 is going to be a statement by customer Kevin</p> <p>8 Allen, and Exhibit 6 is going to be a statement by</p> <p>9 Walmart Associate Roman Cooper. I have those correct</p> <p>10 now.</p> <p>11 All right. So I want to start with the</p> <p>12 associates. So this is going to be Exhibit 6, Roman</p> <p>13 Cooper.</p> <p>14 (Plaintiff's Exhibit 6 marked for</p> <p>15 identification.)</p> <p>16 BY MS. WASHINGTON:</p> <p>17 Q Do you recall reviewing this statement?</p> <p>18 A I don't have, like, memory of it, but I'm</p> <p>19 certain I looked at it and read it.</p> <p>20 Q Okay. And his role in the incident is</p> <p>21 listed as reporter, correct?</p> <p>22 A Yes, ma'am.</p> <p>23 Q Okay. And there are a few typos, but I</p> <p>24 think we can kind of surmise that he says in his</p> <p>25 observation, when he arrived at the scene at the</p>	<p>1 incident, "The customer in question was on the floor</p> <p>2 and in considerable discomfort and was unable to move</p> <p>3 her ankle."</p> <p>4 So to your knowledge, did Roman Cooper</p> <p>5 actually see the incident occur?</p> <p>6 A No, ma'am, I don't believe he did.</p> <p>7 Q Okay. And moving on to Glenda Washburn.</p> <p>8 Her observation here says that she observed the</p> <p>9 customer sitting on the floor complaining of right hip</p> <p>10 and ankle pain. And she said, "She was reaching for</p> <p>11 water on the top shelf, slipped, and hit her hip</p> <p>12 against a water pallet and twisted her ankle. I did</p> <p>13 see water on the floor. The customer had on sturdy</p> <p>14 running shoes and shorts."</p> <p>15 And so based on this report and from -- in</p> <p>16 your knowledge, do you believe that Ms. Washburn</p> <p>17 actually saw the incident occur?</p> <p>18 (Plaintiff's Exhibit 5 marked for</p> <p>19 identification.)</p> <p>20 THE WITNESS: No, ma'am. I don't think she</p> <p>21 saw it occur.</p> <p>22 BY MS. WASHINGTON:</p> <p>23 Q Okay. I'm moving on to the incident report</p> <p>24 of witness Kellie Daughtry. It is my understanding</p> <p>25 that -- is Ms. Daughtry a Walmart associate?</p>

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<p>1 (Plaintiff's Exhibit 4 marked for 2 identification.) 3 THE WITNESS: No, ma'am. 4 BY MS. WASHINGTON: 5 Q Okay. And was she a customer at the store 6 that day? 7 A Yes, ma'am, I believe so. 8 Q Okay. It just says here that her 9 observation was that the fall had just happened as she 10 was passing by. "It was in front of the bottled 11 water. Water was on the floor, and the young lady 12 slipped and hit her hip on a crate on the way down. 13 She was in pain and crying. She said her hip and 14 ankle were hurting." 15 So based on this report, does it appear to 16 you that Kellie actually saw the fall happen? 17 MS. GORDON: Object to the form. 18 THE WITNESS: No, ma'am, it doesn't appear 19 that she saw it happen. 20 MS. WASHINGTON: Okay. 21 BY MS. WASHINGTON: 22 Q And last but certainly not least is Kevin 23 Allen. His observation just says, "She slipped and 24 fell after trying to pick up water from aisle." 25 So from his statement, can you tell if Kevin</p>	<p>1 saw the fall happening? 2 (Plaintiff's Exhibit 3 marked for 3 identification.) 4 A From his statement, I wouldn't know. 5 Q Yes. So that's what I'm asking. Does it 6 appear from his statement to you that he saw the fall 7 happen? 8 MS. GORDON: Object to the form. 9 THE WITNESS: I can't make a determination 10 from what he wrote. 11 MS. WASHINGTON: Okay. I am going to stop 12 sharing my screen. And I want to ask about -- so 13 sorry, you guys. When I switch, this just get ready 14 for a freeze. It's going to happen. Every time I 15 switch it out, it's going to freeze. So let's let it 16 recoup, and now my fan is going super fast on my 17 computer. So let's see if this works. Okay. Here we 18 go, unfrozen. 19 All right. We're almost done, Ms. Parker, I 20 promise you. And I thank you so much for your 21 patience here with us today. This is what's being 22 marked as Plaintiff's Exhibit 7, it is the claim 23 report submitted by the defendant in their initial 24 disclosures. 25 (Plaintiff's Exhibit 7 marked for</p>
<p>1 identification.) 2 BY MS. WASHINGTON: 3 Q Does this claim report look familiar to you? 4 A Yes, ma'am. 5 Q Okay. And I just wanted to go over certain 6 components that I don't know if it was completely 7 filled out or if not. So I wanted to ask particular 8 questions about it. In the section here entitled, 9 "Slip-and-Fall Information," do you know why these 10 items are blank? 11 A I think -- I don't remember when we started 12 taking reports on the tablet, but that -- this is the 13 old way we did reports, kind of, and the tablet is the 14 new way we do reports. And I -- I think in 2020, we 15 were just starting to use the tablets, and I think 16 that's -- it didn't ask him for all that, but it's 17 still on the old reporting, if that makes sense. 18 Q No, it does. So you're saying that this 19 information is generated in the report even though it 20 wasn't asked to the person who filled it out 21 initially. So it comes out blank; is that -- 22 A That's what I think happened, yes. 23 Q Thank you so much. I mean, that's a 24 possibility as to why it's blank, so thank you for 25 that. Sorry, I'm going down because the pages are</p>	<p>1 different sizes, so we're having to go here. 2 And so this is generated from tablet 3 prompts, correct? 4 A Yes. 5 Q Okay. Then I would say the first two pages 6 are, correct? 7 A Yes. 8 Q And so this incident reporting system page 9 here on the third page of my document, where it lists 10 the claim number, and there is QR -- I guess a barcode 11 here where you can scan internally or something like 12 that. Is this form also automatically generated from 13 those tablet prompts? 14 A Yes, ma'am. 15 Q Okay. And they contain primarily the same 16 information, correct? 17 A Yes, ma'am. 18 MS. WASHINGTON: Okay. All right. I'm 19 going to stop sharing screen on that one. Okay. I'm 20 also going to -- I don't know why this won't open on 21 that -- share my screen again. This is going to be 22 Plaintiff's Exhibit 8, which was submitted, not in the 23 initial disclosure, but in Walmart's response to our 24 request for production of documents. And it appears 25 to be -- my screen froze again, y'all. Give me one</p>

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<p>1 second. Okay.</p> <p>2 Tell me if you all see this.</p> <p>3 THE WITNESS: Yes.</p> <p>4 MS. WASHINGTON: Okay. This is a letter</p> <p>5 that was, I guess, sent to Ms. Bennett. It's dated</p> <p>6 for October 16, 2020. And it's in relation to the</p> <p>7 claim, and it gives her, you know, ways in which she,</p> <p>8 I guess, follows up with this.</p> <p>9 (Plaintiff's Exhibit 8 marked for</p> <p>10 identification.)</p> <p>11 BY MS. WASHINGTON:</p> <p>12 Q Do you all also at the actual store receive</p> <p>13 a copy of this particular letter?</p> <p>14 A No, ma'am.</p> <p>15 MS. WASHINGTON: Okay. Stop sharing my</p> <p>16 screen for now. All right. I just need to call back</p> <p>17 my brother about something, he just called me. Can I</p> <p>18 take a quick three-, five-minute recess?</p> <p>19 MS. GORDON: Sure.</p> <p>20 MS. WASHINGTON: All right.</p> <p>21 THE REPORTER: We'll go off the record. The</p> <p>22 time is 10:56 a.m., Central Standard Time.</p> <p>23 (Off the record.)</p> <p>24 THE REPORTER: We are back on the record.</p> <p>25 It is 11:06 a.m., Eastern Standard Time.</p>	<p>1 MS. WASHINGTON: Okay. So I'm going to</p> <p>2 share my screen and kind of go over some of the things</p> <p>3 we discussed. Just, I guess, illustrating some of the</p> <p>4 procedures that you mentioned based on documents</p> <p>5 Walmart shared with us. So give me one second.</p> <p>6 BY MS. WASHINGTON:</p> <p>7 Q So does this form look correct? This is the</p> <p>8 What To Do In The Event Of A Customer Incident Form</p> <p>9 that was submitted to the plaintiff by the defendant.</p> <p>10 Is this a complete and accurate depiction of you all's</p> <p>11 procedures on what to do in the event of a customer</p> <p>12 incident, Ms. Parker?</p> <p>13 A Yes, it looks like it.</p> <p>14 Q Okay. And so I'm not going to read through</p> <p>15 this and go over it in detail, but there are certain</p> <p>16 parts of it that I wanted to, I guess, mention and</p> <p>17 break down, and see if you could tell us if this</p> <p>18 happened in Ms. Bennett's case, okay?</p> <p>19 A Okay.</p> <p>20 Q So here it says that in addition to caring</p> <p>21 for the customer, which is what I believe you said is</p> <p>22 the first thing you all do; is that correct?</p> <p>23 A Yes, ma'am.</p> <p>24 Q Okay. And then there is this section where</p> <p>25 it says, "Lockdown the accident scene." I want to</p>
<p>1 talk about that. What it means to secure the area,</p> <p>2 what does that mean from your -- in your knowledge, to</p> <p>3 your training, what does secure the area mean?</p> <p>4 A I mean, you want to make sure that you don't</p> <p>5 have people just going through it constantly so that</p> <p>6 you can get the photos that you need.</p> <p>7 Q Okay. And it says, "Take photos," which is</p> <p>8 pretty self-evident. And, "Describe the scene on the</p> <p>9 Reversible File Folder," do you know if the scene was</p> <p>10 described in the Reversible File Folder?</p> <p>11 A We don't use the file folders anymore since</p> <p>12 we started using the tablet.</p> <p>13 Q Okay. And so the description of the scene</p> <p>14 on the Reversible File Folder, is there a prompt on</p> <p>15 the tablet that requests you all to describe the scene</p> <p>16 on the -- describe the scene?</p> <p>17 A I don't remember. I don't -- I don't</p> <p>18 remember.</p> <p>19 Q Okay. This is what I believe is the</p> <p>20 incident report, is this, all of this information,</p> <p>21 requested via the tablet?</p> <p>22 A Yes, ma'am. That's an old incident report.</p> <p>23 That's what we used before we used the tablet.</p> <p>24 Q So --</p> <p>25 A So you write that out with, like, pen and</p>	<p>1 paper.</p> <p>2 MS. WASHINGTON: So we already looked at</p> <p>3 this. Hold on one second, y'all. So you're seeing</p> <p>4 what I've been going through every couple of seconds.</p> <p>5 So I'm sorry. It's going to do that for whatever</p> <p>6 reason. Let me stop my screen share because maybe</p> <p>7 that'll let me fix it. I do apologize.</p> <p>8 THE REPORTER: Did you want to mark this as</p> <p>9 Plaintiff's Exhibit 9 or --</p> <p>10 MS. WASHINGTON: I do. I do. Can you</p> <p>11 assist me in keeping those numbers right because I</p> <p>12 think I'm going out of order now than what I</p> <p>13 intentionally planned. So we can keep those, and I'll</p> <p>14 make sure I do that with you to kind of level up.</p> <p>15 THE REPORTER: Absolutely.</p> <p>16 MS. WASHINGTON: All right.</p> <p>17 (Plaintiff's Exhibit 9 marked for</p> <p>18 identification.)</p> <p>19 BY MS. WASHINGTON:</p> <p>20 Q So this is the form that is automatically</p> <p>21 generated from the tablet, correct? Of course, it's</p> <p>22 not a blank copy, this is the one for Ms. Bennett, but</p> <p>23 this is the information that is requested in the</p> <p>24 tablet, correct?</p> <p>25 A That's -- so the old form that you've just</p>

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<p>1 had up, we would write everything on, and then we</p> <p>2 would key it into the incident reporting screen, which</p> <p>3 would then generate that that you just -- that you</p> <p>4 had up again. Yes. So that --</p> <p>5 Q Okay.</p> <p>6 A -- they would fill everything out, and we</p> <p>7 would go to the computer, and we would type it all in.</p> <p>8 Q Okay.</p> <p>9 A Then the screen with a smiley face on it is</p> <p>10 what we would get.</p> <p>11 Q Okay. All right. So this form is old and</p> <p>12 out of date. So this is not what's completed, but the</p> <p>13 information here is what's asked of you all on the</p> <p>14 tablet to complete, and this is what is shot out at</p> <p>15 the end, right?</p> <p>16 A Kind of. The next two pages are actually</p> <p>17 what came out of the tablet.</p> <p>18 Q This?</p> <p>19 A Yes.</p> <p>20 Q Okay.</p> <p>21 A The first two pages are going to be --</p> <p>22 sorry.</p> <p>23 Q Not so fast.</p> <p>24 A See right there. Yes. So that would have</p> <p>25 been what we printed to send in with the video so that</p>	<p>1 we weren't just sending a disk.</p> <p>2 Q Okay. So this is an internal document that</p> <p>3 is basically attached to your video request?</p> <p>4 A Yes.</p> <p>5 Q It's the information that is the product of</p> <p>6 what's input into the tablet when a claim is made?</p> <p>7 A Yes.</p> <p>8 Q Thank you for that clarification. Because I</p> <p>9 was confused when I was reading it because I didn't</p> <p>10 know if, you know, you all just had different</p> <p>11 duplicative reports made, etcetera. So now that we</p> <p>12 have that, I'm good with that. Thank you so much.</p> <p>13 A You're welcome.</p> <p>14 Q I guess, let's go back to this and try to</p> <p>15 clarify what was in place at the time of the incident.</p> <p>16 So at the time of Ms. Bennett's incident, you</p> <p>17 obviously were using the tablet, correct?</p> <p>18 A Correct.</p> <p>19 Q And the prompt to describe the scene on the</p> <p>20 Reversible File Folder is void?</p> <p>21 A I believe so, yes. I know there's no file</p> <p>22 folder.</p> <p>23 Q Okay. But in you all's policy on what to do</p> <p>24 in the event of a customer incident is describing the</p> <p>25 scene of the incident still important or plays a role</p>
<p>1 in some way?</p> <p>2 A Yes. And, I mean, Glenda did describe the</p> <p>3 scene, didn't she, on her statement?</p> <p>4 Q Back to Glenda's statement. I'm sorry. I'm</p> <p>5 getting confused about my broken tidbits. I know what</p> <p>6 I can do because I have hers parcel out. Give me one</p> <p>7 second. Here is Glenda's. She gave her observation</p> <p>8 of what happened, but I don't think she described the</p> <p>9 scene. It says that she saw water on the floor --</p> <p>10 A Okay.</p> <p>11 Q -- in it. But she didn't do a complete</p> <p>12 scene description, from my knowledge. Have you seen</p> <p>13 another document where she may have provided a</p> <p>14 description of the scene?</p> <p>15 A No. This is what I've seen.</p> <p>16 Q Okay. Going back. Next up on the what to</p> <p>17 do in the event of a customer incident, it says,</p> <p>18 "Alert management." So members are to notify a</p> <p>19 salaried member of management.</p> <p>20 A So -- go ahead.</p> <p>21 Q Oh, you can go ahead.</p> <p>22 A In neighborhood markets, at the time, 2020,</p> <p>23 we had two salaried members of management in the</p> <p>24 building. So that's not actually applicable to our</p> <p>25 store because we leave our leads as the manager on</p>	<p>1 duty. So it would be to notify the manager on duty,</p> <p>2 which would have been Roman.</p> <p>3 Q That makes sense. Thank you for that</p> <p>4 clarification because that was going to be my very</p> <p>5 next question to ask. So that was well clarified.</p> <p>6 And so after we've locked down the scene, alerted</p> <p>7 management, cared for the customer, we move into the</p> <p>8 investigation. But before I do that, I want to kind</p> <p>9 of go back to the lockdown of the scene.</p> <p>10 Do you know if the accident scene was locked</p> <p>11 down?</p> <p>12 A No, ma'am, I'm not aware.</p> <p>13 Q Okay. So during the investigation, these</p> <p>14 particular -- again, I'm not going to read all to you</p> <p>15 the who, what, whens, wheres, and whys. The</p> <p>16 investigation includes these particular matters, are</p> <p>17 you aware that the investigation points here were all</p> <p>18 completed in Ms. Bennett's case?</p> <p>19 A As far as I know, yes.</p> <p>20 Q Okay. Next up is to make the report, we</p> <p>21 know that a report was made, and then you save and</p> <p>22 submit evidence. So saving evidence. You mentioned</p> <p>23 earlier a portal that you all use to submit this</p> <p>24 information, is the information saved to that portal,</p> <p>25 or is it saved to a different location?</p>

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<p>1 A It goes into the accident app. It's not -- 2 it's not saved on that tablet or anything. It goes to 3 claims management.</p> <p>4 Q Okay. So it's submitted via the Internet? 5 A Via the app, yes, ma'am.</p> <p>6 Q So the application on the tablet which has 7 Internet access, and it is submitted or transmitted to 8 that location you mentioned? 9 A Yes.</p> <p>10 Q Okay. Just wanted to verify that. Okay. 11 So I kind of want to go back to the safety training 12 that all associates receive. And I'm not going to go 13 into detail about how you're to maintain your stations 14 and all that. I just wanted to speak about a few 15 applicable situations here, and I want to talk about 16 the standard operating procedure.</p> <p>17 Is this particular step an action required 18 what is involved in the safety training that you 19 mentioned earlier for associates? 20 A So that's an -- a standard operating 21 procedure. That wouldn't have been -- I mean, we 22 would have discussed it in a safety tour. And then 23 associates -- that's on OneWalmart, which is our 24 online portal, I guess.</p> <p>25 Q Okay.</p>	<p>1 A And any associate has access to go search 2 for SOPs or -- now they're called process guides, to 3 learn how to do pretty much anything in the store.</p> <p>4 Q Okay. So that is the just SOP, the standard 5 operating procedure for that particular matter, but it 6 is not a checklist or point of reference during the 7 safety training -- 8 MS. GORDON: Object to the form. 9 THE WITNESS: It's not -- I mean, they don't 10 have to sign it or anything or check anything off, but 11 they do hear about how to clean up spills. 12 MS. WASHINGTON: Okay. 13 BY MS. WASHINGTON: 14 Q And so, obviously, the course module here 15 that's on workplace safety, is this model animated? 16 Because I see where it says, "2470 plus 8 minutes of 17 video," can you tell me about this module on safety? 18 A Sure. It's going to be part of their 19 computer learning, which every associate does. 20 Basically, you sit down at the computer, you have 21 headphones, and there's going to be things you read, 22 and there's going to be videos. A lot of times there 23 are questions during the module, and sometimes there's 24 a test at the end that they have to pass. 25 MS. WASHINGTON: And so for, I guess, the</p>
<p>1 court reporter, this is going to be our next exhibit, 2 and it is the printout of the workplace safety 3 learning module that was given to the plaintiff and 4 the defendant's responses to our request for 5 production of documents. 6 THE REPORTER: Okay. 7 (Plaintiff's Exhibit 10 marked for 8 identification.) 9 MS. WASHINGTON: Okay. Next up, we are 10 going to go over some more of safety and spill-related 11 procedures that must be handled -- or, you know, is 12 how it's shown. I wanted to look at this diagram. 13 This is also going to be an exhibit. 14 (Plaintiff's Exhibit 11 marked for 15 identification.) 16 BY MS. WASHINGTON: 17 Q Is this diagram provided to employees at the 18 Walmart Helena store? 19 A We have that at the spill stations. 20 Q Okay. So this is posted at the spill 21 stations in the store? 22 A Yes. It's supposed to be. 23 Q Okay. Do you know if it was posted the day 24 of Ms. Bennett's accident? 25 A I mean, I don't know 100 percent. It should</p>	<p>1 have been. 2 Q Okay. And I know you mentioned the -- I'll 3 go back to that. 4 So we've talked about different types of 5 spills earlier. But can you tell us, I guess, about 6 spill cleanup procedures and the training that is done 7 on those procedures with you all's associates. So is 8 this particular safety awareness and education an 9 online learning module as well, or is this done in 10 some other way? 11 MS. GORDON: Object to the form. 12 THE WITNESS: I don't think that's an online 13 learning. I think that's in the process guide or an 14 SOP. But it -- I mean, they learn about spill 15 cleanups in the u-learn, and also during the safety 16 tour, like, we talk about it. 17 BY MS. WASHINGTON: 18 Q Okay. So during the safety tour that you 19 all do in person at the store location, certain 20 aspects of this is discussed? 21 A Correct. 22 Q So we don't have to go into detail about 23 those particular items. Thank you. I'm going to stop 24 sharing my screen here. All right. And we are almost 25 done, Ms. Parker, but I did want to go back to you</p>

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<p>1 all's store.</p> <p>2 And so to your knowledge, the flooring in</p> <p>3 the water aisle, does it contain permanent scuff marks</p> <p>4 that are on the floor?</p> <p>5 MS. GORDON: Object to the form.</p> <p>6 THE WITNESS: I can answer?</p> <p>7 MS. GORDON: If you can, yes.</p> <p>8 THE WITNESS: I think there are some marks</p> <p>9 on the floor that are burn marks that we can't get</p> <p>10 out.</p> <p>11 BY MS. WASHINGTON:</p> <p>12 Q And do those marks sometimes obscure, I</p> <p>13 guess, other substances that may be on the floor?</p> <p>14 MS. GORDON: Object to the form.</p> <p>15 THE WITNESS: Not that I know of.</p> <p>16 MS. WASHINGTON: Okay.</p> <p>17 BY MS. WASHINGTON:</p> <p>18 Q And what about the condition of the pallets</p> <p>19 that contain -- that hold the water in that aisle, are</p> <p>20 you aware of the condition of those pallets at the</p> <p>21 time of Ms. Bennett's accident?</p> <p>22 A No, ma'am, I'm not.</p> <p>23 Q Okay. I do want to go back, I guess, to the</p> <p>24 photos. I'm going to share my screen again. These</p> <p>25 were previously shown to you earlier, but I want to</p>	<p>1 kind of just -- kind of look at these pallets a little</p> <p>2 closer. So here, this pallet that's on the screen</p> <p>3 now, does it appear like a jagged edge to the pallet?</p> <p>4 MS. GORDON: Object to the form.</p> <p>5 THE WITNESS: It appears that there's a</p> <p>6 small piece out of the front.</p> <p>7 MS. WASHINGTON: That there's a small piece</p> <p>8 out of the front, okay.</p> <p>9 BY MS. WASHINGTON:</p> <p>10 Q And do you think that this affects the</p> <p>11 safety of that pallet at all with that chunk of -- a</p> <p>12 piece, not chunk. I'm sorry, that was my terminology</p> <p>13 -- but the piece missing?</p> <p>14 MS. GORDON: Object to the form. Answer if</p> <p>15 you know.</p> <p>16 THE WITNESS: I don't think so.</p> <p>17 MS. WASHINGTON: Okay.</p> <p>18 BY MS. WASHINGTON:</p> <p>19 Q And are you aware of customers complaining</p> <p>20 about the cleanliness of this store?</p> <p>21 A When?</p> <p>22 Q On any --</p> <p>23 A I mean, some customers have complained about</p> <p>24 cleaning on certain days.</p> <p>25 Q Okay. And how often would you say spills</p>
<p>1 happen on the store on a daily basis, how often would</p> <p>2 you say there are spills?</p> <p>3 MS. GORDON: Object to the form.</p> <p>4 THE WITNESS: I don't know. I mean, I</p> <p>5 wouldn't say that we have spills every single day.</p> <p>6 MS. WASHINGTON: Okay.</p> <p>7 BY MS. WASHINGTON:</p> <p>8 Q Are you aware of any structural issues with</p> <p>9 you all's building?</p> <p>10 A None that I'm aware of, no, ma'am.</p> <p>11 Q Okay. Are you aware of any leaking lights</p> <p>12 or ceiling?</p> <p>13 A No, ma'am, not that I'm aware of.</p> <p>14 Q Are you aware of any leaking refrigerators?</p> <p>15 A No, ma'am.</p> <p>16 Q Okay. And in the event that you became</p> <p>17 aware of a leaking refrigerator or a leaking roof,</p> <p>18 what would be your next steps to resolve that issue?</p> <p>19 A If a refrigerated case is leaking, we take</p> <p>20 the product out and clean it and clean the fan to make</p> <p>21 sure there's nothing wrong with it and see if that</p> <p>22 helps. If not, we open a ticket and get our</p> <p>23 refrigeration people out.</p> <p>24 If the roof is leaking, we open a ticket.</p> <p>25 We put a bucket to collect any water that's dripping</p>	<p>1 and put in a ticket so that someone can come out and</p> <p>2 repair the roof.</p> <p>3 Q Okay. And do you all put up any cautionary</p> <p>4 signs or materials like cones or --</p> <p>5 A Yes. If you couldn't, like, clean</p> <p>6 everything, we would put a cone out to alert</p> <p>7 customers.</p> <p>8 Q Okay. And do you recall anyone stating</p> <p>9 anything about the weather the day of this incident,</p> <p>10 what the weather was like? Have you seen any</p> <p>11 statements or reports mentioning the weather the day</p> <p>12 of Ms. Bennett's accident?</p> <p>13 A No, ma'am, I have not.</p> <p>14 Q Okay. Are you aware of any investigations</p> <p>15 that looked for or, I guess, try to uncover the source</p> <p>16 of the water that was on the floor when Ms. Bennett</p> <p>17 fell?</p> <p>18 A No, ma'am, I'm not aware of any.</p> <p>19 Q And are you aware of any statement as to how</p> <p>20 the water got on the floor when Ms. Bennett fell?</p> <p>21 A No, ma'am.</p> <p>22 Q And do you know if Walmart is self-insured?</p> <p>23 A Yes. We are self-insured up to something.</p> <p>24 Q Okay. Could you find that amount or --</p> <p>25 A I probably --</p>

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<p>1 Q -- are you ever made aware of that amount 2 that you all are self-insured for? 3 A I could probably find it if I called 4 somebody, called CMI or somebody. 5 Q Okay. And who is that? 6 A That's our claims department. 7 Q Okay. And does your store have a particular 8 claims manager or claims handler? 9 A Usually, we have the same people for -- one 10 for customer incidents and one for associate, I 11 believe. 12 Q Okay. And do you know who that person is 13 for a customer? 14 A No, ma'am, not off the top of my head. I 15 did see Matthew Fowler's name on that letter you 16 showed earlier. 17 Q Okay. And are you familiar with Mr. Fowler? 18 A I'm sure I've spoken to him before, but 19 beyond talking to him on the phone, not really. 20 Q Okay. But generally, when you all have 21 incidents, you deal with the same handlers? 22 A Pretty much, yes. 23 MS. WASHINGTON: Okay. All right. I 24 believe that's all the questions that I have for you 25 at this time.</p>	<p>1 MS. GORDON: And I just have a few 2 questions. 3 THE REPORTER: Okay. 4 MS. GORDON: Let me sit over here so you're 5 still facing them. 6 EXAMINATION 7 BY MS. GORDON: 8 Q All right. Ms. Parker, before Plaintiff 9 reported her fall on October 15th, 2020, had anyone 10 notified you about any water or liquid substance on 11 the floor of the water aisle? 12 A No. 13 Q Has any employee ever told you that they 14 were notified of water or a liquid substance on the 15 floor of the water aisle before Plaintiff's fall on 16 October 15, 2020? 17 A No. 18 Q Has anyone told you they observed water or a 19 liquid substance on the water aisle before Plaintiff's 20 fall on October 15, 2020? 21 A No. 22 Q Before Plaintiff's fall on October 15, 2020, 23 had others been down the water aisle that day? 24 A Yes. I'm sure other people were down the 25 aisle.</p>
<p>1 Q Had there been vendors down that aisle 2 before her fall? 3 A Yes. Coke and Pepsi would have stocked 4 their pallets that day. 5 Q Did any of the vendors report to you any 6 safety concerns on the water aisle? 7 A No. 8 Q Have they reported safety concerns to you in 9 the past? 10 A Yes. 11 Q What about, had other employees been down 12 the water aisle before Plaintiff's fall on October 15, 13 2020? 14 A Yes. 15 Q And none of the employees reported any water 16 or liquid substance on the aisle -- 17 A No, ma'am. 18 Q -- or any safety concerns? 19 A No, ma'am. 20 Q And I assume there've been other customers 21 throughout the day on that aisle? 22 A Yes. 23 Q It was later in the day, correct? 24 A Yes, ma'am. 25 Q What time did y'all open that morning?</p>	<p>1 A 6 a.m., I believe. 2 Q So probably a full day's worth of customers 3 before the incident happened? 4 A Yes. 5 Q Were you notified of any other customer 6 incidents, either slips, falls, or injuries on the 7 water aisle on October 15, 2020, besides Plaintiff's? 8 A No, ma'am. 9 Q Were you aware of any leaks on the water 10 aisle prior to Plaintiff's fall on October 15, 2020? 11 A No. 12 Q You aware of any roof leaks or refrigerator 13 leaks that would have breached the water aisle around 14 October 15, 2020? 15 A No. 16 MS. GORDON: That's all that I have. 17 THE REPORTER: Okay. Any further questions, 18 Ms. Washington? 19 MS. WASHINGTON: Yeah. I have a few follow 20 ups, and I promise it's going to be short. 21 EXAMINATION 22 BY MS. WASHINGTON: 23 Q As far as the reports to employees, are you 24 aware of any other employees who were notified of a 25 leak in the water aisle before Ms. Bennett's fall?</p>



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<p>1 A No, ma'am.</p> <p>2 Q Do you know how long it took an associate to</p> <p>3 see Ms. Bennett after her incident?</p> <p>4 A No, ma'am, I'm not aware.</p> <p>5 Q Okay. And do you know if any precautionary</p> <p>6 measures were taken to prevent others from falling</p> <p>7 after Ms. Bennett's fall?</p> <p>8 A After her fall and she left, we -- Roman</p> <p>9 would have cleaned up the water so that there was no</p> <p>10 more water in the floor, and there were no more risks</p> <p>11 of anyone falling.</p> <p>12 Q Okay. But you believe after she left, the</p> <p>13 area was cleaned?</p> <p>14 A Yes, ma'am, I do.</p> <p>15 Q And while Ms. Bennett was there, was there</p> <p>16 anything done to prevent other falls?</p> <p>17 A I'm not sure. But I'm sure that, you know,</p> <p>18 they were focused on taking care of her, and then they</p> <p>19 also had to take photographs. But as far as I could</p> <p>20 tell from the video that I saw, there were a lot of</p> <p>21 people on the aisle, so nobody was going to go on that</p> <p>22 aisle anyway.</p> <p>23 Q You believe no one would have gone on that</p> <p>24 aisle anyway?</p> <p>25 A Correct.</p>	<p>1 Q But there are chances that people, despite</p> <p>2 commotion, would still wander down that aisle?</p> <p>3 A It could happen.</p> <p>4 Q And as far as the matters to prevent others</p> <p>5 from falling and cleaning the spill, that did not</p> <p>6 occur until after Ms. Bennett had left the store,</p> <p>7 correct?</p> <p>8 A Well, if associates are there with her</p> <p>9 still, we always warn customers, hey, be careful,</p> <p>10 there's something in the floor here.</p> <p>11 Q Do you know if that was done?</p> <p>12 A As Roman was standing there, he would have</p> <p>13 told people not to walk through the water or to be</p> <p>14 careful.</p> <p>15 Q He would have, but do you know if he did</p> <p>16 that? Is there any indication from any of your</p> <p>17 statements with Roman or any of the written reports</p> <p>18 that we've shown here today where that was done?</p> <p>19 MS. GORDON: Object to the form. Answer if</p> <p>20 you know.</p> <p>21 THE WITNESS: I don't. I don't know if he</p> <p>22 did or didn't, but that's what he was trying to do.</p> <p>23 MS. WASHINGTON: Correct.</p> <p>24 BY MS. WASHINGTON:</p> <p>25 Q But are you aware of anyone other than Roman</p>
<p>1 who would have warned others of the situation --</p> <p>2 MS. GORDON: Object --</p> <p>3 MS. WASHINGTON: -- where it was located?</p> <p>4 No, you're fine.</p> <p>5 THE WITNESS: I don't know who was on the</p> <p>6 aisle with Glenda and Roman.</p> <p>7 MS. WASHINGTON: Okay. So that's all I</p> <p>8 have. Thank you so much for speaking with me today.</p> <p>9 MS. GORDON: Thank you, Ellise.</p> <p>10 MS. WASHINGTON: Thank you.</p> <p>11 THE REPORTER: Okay. Just before going off</p> <p>12 the record, Ms. Washington, did you want to order a</p> <p>13 transcript of this proceeding?</p> <p>14 MS. WASHINGTON: Oh, of course.</p> <p>15 THE REPORTER: Yes? Okay.</p> <p>16 MS. WASHINGTON: Yes.</p> <p>17 THE REPORTER: And Ms. Gordon?</p> <p>18 MS. GORDON: We just need the e-transcript.</p> <p>19 THE REPORTER: E-transcript?</p> <p>20 MS. GORDON: Thank you.</p> <p>21 THE REPORTER: Okay. Thank you. We are</p> <p>22 going off the record. The time is now 11:36 a.m.,</p> <p>23 Central Standard Time.</p> <p>24 (Signature Waived.)</p> <p>25 (Whereupon, at 11:36 a.m., the proceeding</p>	<p>1 was concluded.)</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, Freya Amis, A Remote Online Notary of the</p> <p>3 State of Ohio, duly authorized to administer oaths, do</p> <p>4 hereby certify:</p> <p>5 That I am a disinterested person herein;</p> <p>6 that the witness, Elizabeth Parker, named in the</p> <p>7 foregoing deposition, was by me duly sworn to testify</p> <p>8 the truth, the whole truth, and nothing but the truth;</p> <p>9 that the deposition was reported by me, Freya Amis,</p> <p>10 and is a true and correct record of the testimony so</p> <p>11 given.</p> <p>12 IN WITNESS WHEREOF, I hereby certify this</p> <p>13 transcript at my office in the State of Ohio on this</p> <p>14 29th day of June 2023.</p> <p>15</p> <p>16</p> <p>17 </p> <p>18</p> <p>19 Freya Amis</p> <p>20 Remote Online Notary Public in and for the</p> <p>21 State of Ohio</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 CERTIFICATE OF TRANSCRIBER</p> <p>2 I, FREYA AMIS, do hereby certify that this</p> <p>3 transcript was prepared from the digital audio</p> <p>4 recording of the foregoing proceeding, that said</p> <p>5 transcript is a true and accurate record of the</p> <p>6 proceedings to the best of my knowledge, skills, and</p> <p>7 ability; that I am neither counsel for, related to,</p> <p>8 nor employed by any of the parties to the action in</p> <p>9 which this was taken; and, further, that I am not a</p> <p>10 relative or employee of any counsel or attorney</p> <p>11 employed by the parties hereto, nor financially or</p> <p>12 otherwise interested in the outcome of this action.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17 </p> <p>18</p> <p>19 FREYA AMIS</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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